

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF GEORGIA  
ATHENS DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**AHKIL NASIR CRUMPTON**

**CASE NO.: 3:22-CR-00012-CAR-CHW-1**

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**NOTICE OF INTENT TO RELY ON EXPERT WITNESS TESTIMONY AND  
SUMMARY OF TESTIMONY OF CERTIFIED WIRELESS ANALYST MANFRED  
SCHENK**

**COMES NOW** the Defendant, Ahkil Nasir Crumpton, by and through undersigned counsel and pursuant to Federal Rule of Criminal Procedure 16(b)(1)(C) and Federal Rules of Evidence 702, 703, and 705 files this Notice of Intent to Introduce Expert Witness and summary of Testimony of Manfred Schenk. Mr. Crumpton respectfully reserves the right to offer additional testimony by this expert, or other expert witnesses, and for the expert to amend or adjust his opinions and bases for those opinions should additional information, not current known or available, become known to the expert before or during trial.

This expert testimony will be in the discipline of cellular telephone technology and historical cell site analysis. Since 2001 Mr. Schenk has been employed with Cherry Biometrics, Inc. as a Senior Technology Officer. His duties are many and include historical cell site analysis and other areas of cellular telephone technology. He has multiple degrees and is a Certified Wireless Analyst. He has testified in both federal and state courts as an expert witness on these same topics. His Curriculum Vitae (CV) is attached to this pleading.

1) Mr. Schenk's Publications and Prior Testimony

Mr. Schenk has not published anything on this issue in the last 10 years. He has testified in approximately 53 cases between 2010 and 2023. The list of those cases is likewise attached to this pleading.

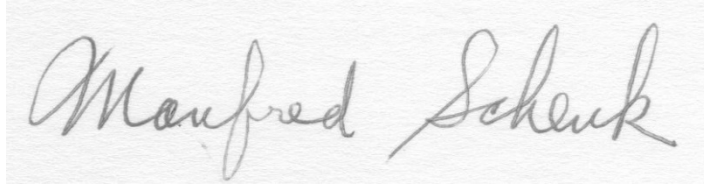
2) Statement of Opinions, Bases and Reasons

Mr. Schenk will testify at trial on behalf of Mr. Crumpton regarding his analysis of historical cell site and location data of the records and data provided by the government in discovery as to cellular telephone (215) 807-9708. Mr. Schenk will explain how cellular telephone technology works, including how cell site towers work and how cellular telephones connect and otherwise interact with those cell site towers. He will discuss how data relating to the connection between cell site towers and cellular telephones is recorded and reported in call records retained by cellular telephone service providers, including AT&T.

Mr. Schenk will explain the methodology used to create his report. (Attached) Specifically he will testify as to how the information provided in the AT&T call detail records is insufficiently precise to meaningfully determine the location of the cellular phone in question. This includes both the Call Detail Records as they relate to the ability to determine the direction and distance the cell phone in question is from the cell tower at the moment of connection, as well as the fact the Network Event Location System Records (NELOS) provided by AT&T in this case contain numerous errors rendering them unreliable and not credible for determining the location or direction of the cell phone in question.

Mr. Schenk might also testify about his opinion regarding any expert testimony provided by the government on this same issue.

By his signature herein, Manfred Schenk indicates his approval of this disclosure, made pursuant to F.R.Cr.P. §16(b)(1)(C).

A handwritten signature in cursive script that reads "Manfred Schenk". The ink is dark and the background is a light, textured surface.

This 3<sup>rd</sup> day of October 2023.

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**Manfred Schenk**

Respectfully submitted, this 3<sup>rd</sup> day of October 2023.

**/s/Timothy R. Saviello**

Timothy R. Saviello

. Bar No. 40527

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing pleading with the clerk of Court using the CM/ECF system which will send notification of such to all counsel of record.

Respectfully submitted,

**/s/Timothy R. Saviello**

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